

EXHIBIT 32

1 PAUL CARLUCCI
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

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AUSTIN FENNER and IKIMULISA LIVINGSTON,

Plaintiffs,

-against-

09 CIV 9832 (BSJ) (RLE)

7
8 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
9 THE NEW YORK POST and DAN GREENFIELD and
MICHELLE GOTTHELF,

Defendants.

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SANDRA GUZMAN,

Plaintiff,

vs. 09 CIV 9323 (BSJ) (RLE)

11 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a
12 THE NEW YORK POST, and COL ALLAN, in his
13 official and individual capacities,
14
15

Defendants.

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18 VIDEOTAPED DEPOSITION OF PAUL CARLUCCI
19 New York, New York
20 Friday, June 22, 2012
21

22 REPORTED BY: BARBARA R. ZELTMAN

(BOBBIE)

23 Professional Stenographic Reporter
24

25 Job Number: 50903

Page 126

PAUL CARLUCCI

MR. THOMPSON: Mr. Kasowitz, I'm attempting to do so. As you know, there's a lot of traffic going by. I want him to finish. I want him to finish all the questions so the record could be developed.

If you haven't finished your last answer, I'll have it repeated so your answer is fully stated on the record.

MR. KASOWITZ: We are going to do that. You have a habit, Mr. Thompson, of trying to ask a question before the next question is finished. I don't know why you do it. I don't know whether you think you get an advantage by doing it. I don't know. But it's not going to happen.

And that is part of the Federal Rules.

All right. So let's go back to that question. Let's hear the witness' answer. If he has anything to add to it, then he will. If not, then we can move

Page 128

PAUL CARLUCCI

MR. KASOWITZ: Do you have anything to add to that?

THE WITNESS: I don't know if I do or not. That's fine. That would be my opinion.

Q Okay.

And so Mr. Carlucci, your opinion that there was no racist intent behind the cartoon is not based on any conversation you had with any editor at The New York Post about the cartoon, correct?

MR. KASOWITZ: Object to form. You can answer.

A That would be correct.

Q Do you know if any employee at The New York Post complained about this cartoon?

A Not that I recall.

Q Do you know if any employee at The New York Post objected to this cartoon?

MR. KASOWITZ: Object to form. You can answer.

A Not that I recall.

Q Do you know if Sandra Guzman ever

Page 127

PAUL CARLUCCI

on.

MR. THOMPSON: Mr. Kasowitz, I don't have a habit of trying to get the witness to answer a question before the witness is finished. The witness has answered the questions and when I thought he finished, I ask my next question. You don't have to remind of me the Federal Rules are. I know the Federal Rules.

BY MR. THOMPSON:

Q Mr. Carlucci, I'm going to have the last question asked again and if you have answered it, tell me. If you want to add anything to it, let me know.

(Requested portion of record read:

"Q. Now, when you say you don't believe that the intent was racist, as you sit here today, can you tell us if you spoke to anyone at The Post on the Editorial side about the cartoon that led you to believe that it wasn't intended to be racist?")

(End of read-back.)

Page 129

PAUL CARLUCCI

objected to this cartoon?

A No, I do not.

Q Do you know if Ms. Guzman ever complained about this cartoon during her employment at The Post?

A Not that I recall.

MR. KASOWITZ: Can we go off the record for a second.

THE VIDEOGRAPHER: The time is 12:27. We're going off the record.

(Discussion off the record.)

THE VIDEOGRAPHER: The time is 12:28. Back on the record.

MR. THOMPSON: Can we have that marked as Carlucci Number 2.

(Carlucci Exhibit 2, E-mail chain, top e-mail dated Thursday, February 19, 2009, 4:18 p.m., Bates Number NYP-1818, was marked for Identification.)

MR. THOMPSON: For the record, Carlucci Deposition Exhibit 2 is Bates stamped NYP-1818.

Q Mr. Carlucci, please take moment